

**REMARKS**

Reconsideration and withdrawal of the outstanding ground of rejection is respectfully requested in light of the above amendments and the remarks which follow.

At the outset, applicant has cancelled claims 1-3 in favor of new claim 7 which represents a combination of original claims 1-3 but with additional limitations relating to the powder composition and a VDC range through which the electrically insulating powder composition coating remains functional. This range more accurately reflects the disclosure, particularly on page 5 of the specification.

The Examiner has rejected the application claims under 35 U.S.C. 103 as unpatentable over Holter in view of Lemelson. The Examiner has concluded that it would have been obvious to one of ordinary skill in the art to modify the bolts used in the dynamo-electric machine of Holter to provide some portion of the shank in the underside of an integral flange of the bolt with an electrically insulating composition coating, i.e., the diamond coating disclosed in Lemelson.

With regard to the latter, the Examiner contends that it is known that diamond coatings have high voltage electric insulation properties. The Examiner also contends that it would have been obvious to apply the coating using powder coating technology.

With respect to new claim 7, it is apparent that the Holter reference is wholly irrelevant. Holter merely discloses vibration reduction in electric motors, and part of the vibration reduction techniques employed in Holter is the use of bolts with neoprene washers and sleeves to eliminate metal-to-metal contact and thereby reduce unwanted vibration and noise. With respect to Lemelson, it appears that the Examiner has

attributed more to the disclosure than is warranted. For example, Lemelson is concerned with protection of fasteners against head and chemical corrosion. To the extent that Lemelson even recognizes an electrical insulation characteristic of a diamond coating, it is in connection with the corrosive effects experienced by electro-chemical attack that may be reduced substantially by the use of a coating or film of synthetic diamond material. Again, the emphasis is on protection against chemical corrosion.

In addition, Lemelson's lack of concern with respect to electrical insulation is demonstrated by the fact that in most of the examples disclosed in the reference, a thin coating of chromium is deposited on the outer surface of the diamond coating. The chromium is, of course, electrically conductive.

The Examiner has also simply assumed that it would have been obvious to one of ordinary skill in the art to apply diamond coating utilizing powder composition technology. Lemelson discloses that the synthetic diamond material may be deposited on the fastener by passing intense radiation such as microwave radiation through a suitable gas or fluid containing atoms of carbon, in such a manner as to cause such carbon atoms to become deposited as a thin layer of hard synthetic diamond or diamond-like material (see column 2, lines 53-62). Lemelson is silent with respect to epoxy powder compositions.

In addition, and because Lemelson is wholly unconcerned with electrical insulation properties of fasteners, there is no disclosure or suggestion that the fastener, from an electrical insulation standpoint, remains functional when the bolt is fully tightened within a range of 500-2500 VDC.

Thus, Lemelson neither discloses nor suggests an electrically insulating epoxy powder composition coating for a bolt that remains functional when the bolt is fully tightened, and at an electrical potential of between 500 and 2500 VDC as required by new claim 7, and as also required by independent claim 4 as amended herewith. With further regard to claim 4, the mere fact that Holter discloses an electric motor that incorporates vibration reducing fasteners, in no way provides evidence with respect to the obviousness of the electrically insulated bolts as defined in independent claim 4. Thus, the combination of Holter and Lemelson clearly fails to establish *prima facie* obviousness with respect to any of the claims of the application, and therefore, reconsideration is respectfully requested.

Entry of the proposed amendment is believed fully consistent with 37 CFR 1.116(b) in that the scope of the claims has been narrowed and thus at the very least, the claims are placed in better condition for appeal if not outright allowance.

It is respectfully submitted that claims 4-7 are now in condition for immediate allowance.

The Examiner is encouraged, however, to telephone the undersigned in the event any small matters remain outstanding in order to expedite the prosecution of this application.

Respectfully submitted,  
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